**ISSUES ESCHELON RAISED IN SEPTEMBER OF 2000 IN ARIZONA 271[1]
THAT REMAIN PROBLEMS TODAY (July of 2002)[2]**

Customer-Affecting UNE-P Problems
Feature Availability Issues With UNE-P
Time Consuming and Cumbersome UNE-P Ordering
Inadequate Support for Resolving Issues
Cutover Issues

1.   **CUSTOMER-AFFECTING UNE-P PROBLEMS**

*Summary: Qwest UNE-P conversions and migrations are still resulting in
customer-affecting problems. In May 2002, for example, more than 17% of the
UNE-P orders provisioned by Qwest had trouble reports within 30 days of order
completion.[3] The majority of these Qwest-related troubles were Qwest order
writer errors or errors on line side translations. Eschelon raised this issue in AZ
271 in the Fall of 2000. Eschelon has recently started ordering UNE-P again,
and the same types of problems have re-surfaced.*

2000 - Sept. Comments, *see, e.g.*, p. 28: "Both new customers and customers moving
from resale to UNE-P-POTS have experienced service disruption when Qwest completes
UNE-P-POTS orders. For example, customers have experienced:
-      complete outages, with no dial tone, for a day or more
-      inability to call out locally
-      inability to place long distance calls
-      loss of features
-      inability to forward calls between central offices
Resolving these issues has been a time-consuming and frustrating experience."

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[1] *See* Eschelon's Comments Addressing UNE Combinations, *In re. U S WEST Communications, Inc.'s
Compliance with § 271 of the Telecommunications Act of 1996*, Arizona Docket No. T-00000A-97-0238
(Sept. 21, 2000) ("Sept. Comments"); *see also* Verification of Garth Morrisette (same) (both documents are
part of Eschelon Exhibit 4-1 in this proceeding, AZ Docket No. T-00000A-97-0238).
[2] As to issues that appear to have been addressed, virtually all of the issues were resolved in the manner
advocated in 2000 by Eschelon. For example, Qwest had a policy at that time of requiring an amendment
to the interconnection agreement for UNE-P, even though the agreement already provided that CLEC had
access to combinations. *See* Sept. Comments, pp. 4-9. Today, Eschelon is able to order UNE-P pursuant to
the same interconnection agreement that was in effect in 2000, without amendment. Although CLECs
prevailed on such issues, the length of time that Qwest took to change its policies was unnecessary and
delayed competition. For example, by the time that Eschelon filed its Sept. Comments in this proceeding,
Eschelon had already been arguing with Qwest that no contract amendment was required for a period of
months. If Qwest had simply honored the contract from the start, many issues that did not arise until later
could have been resolved earlier.
[3] The total percentage of Off-Net (UNE-P and UNE-Star) order installations that have trouble reports
within 30 days is significant. In April and May of 2002, for example, more than 50% of Off-Net order
installations had trouble reports within 30 days.   In May, more than 40% of the troubles reported within 30
days of off-net order completions were new UNE-P orders.

2002 Experience: Same types of customer-affecting problems occur when a new customer moves to Eschelon on UNE-P today. Recent Arizona examples of Qwest-caused customer-affecting problems on new UNE-P orders include:

> **Loss of Features**: Customer A UNE-P conversion on 7/10/02 [Call Forward Don't Answer/Busy Line (CFDA/BL) feature missed completely on one line on order. No Call Forward Number (CFN) on Call Forward Don't Answer (CFDA) on another line. Had to escalate to tier two to have corrected. Escalation tckt # 1416507- two correcting orders typed to add features to one line, and CFN to CFDA on another.] This business customer experienced feature problems for more than 31 hours due to Qwest order typist error.

> **Loss of Dial Tone on All Lines**: Customer B UNE-P conversion on 5/31/02 [7am Frame Due Time (FDT), Disconnect (D) order worked 7am, new connect/service (N) order not worked until after 1pm. Escalation tckt # 1371579-N order worked.] This business customer lost dial tone and was without dial tone from approximately 7am to after 1pm during the business day due to a Qwest error in the UNE-P conversion.

> **Loss of Dial Tone on One Line**: Customer C UNE-P conversion on 6/18/02 [7am FDT. One line ringing disconnect as of 12:30pm CST. Escalation tckt # 1389170-RCMAC programmed line.] This business customer had no dial tone from approximately 7am to after noon during the business day due to a Qwest error in the UNE-P conversion.

In addition to submitting new UNE-P orders, Eschelon is currently in the process of migrating some of its customer lines on UNE-Star to UNE-P. Qwest is handling this migration on a project basis, which means that the orders are hand-held in the sense that they are being monitored and handled separately. Despite the project handling of these orders, the migration orders have also resulted in Qwest-caused customer affecting issues. Although the problems occur less frequently for migrations than for new conversions (as would be expected due to the special handling of the migration orders), Eschelon expends substantial resources escalating and resolving these issues. Examples of problems include:

> **Loss of Features**: In May, June, and July of 2002, Arizona customers experienced loss of features, such as caller ID, hunting, call waiting or call forwarding not working; incorrect programming of ring cycle; message waiting audio not working; and loss of DSL service as a result of Qwest UNE-P migrations.

> **Inability to Call Out**: On July 11-12, 2002, an Arizona customer could not call out for more than a day as a result of a Qwest UNE-P migration.

2. **FEATURE AVAILABILITY ISSUES WITH UNE-P**

Summary: Qwest continues to deny access to Remote Access Forwarding with UNE-P. Qwest does so even though it is a switch feature and Qwest previously testified that switch features would be available with UNE-P, regardless of whether Qwest moved the feature to an AIN platform for its own use. With respect to feature availability generally, Qwest now has documentation on its web page but there are still gaps and inconsistencies. Clearly documented feature information is critical to developing and marketing a product.

A. **Remote Call/Access Forwarding (AFD)**

2000 - Sept. Comments, *see, e.g.*, p. 21: "Qwest indicated that it had discovered that one of the trial UNE-P-POTS orders that Qwest completed successfully for Eschelon included Remote Call (or "Access") Forwarding (AFD). Qwest said that this feature is not available with UNE combinations because it is an Advanced Intelligent Network ("AIN") feature."; *see also* 2000 – 10/10/00 Transcript, p. 78, lines 12-21 (Garth Morrisette of Eschelon pointed out that Qwest listed Remote Access Forwarding, AFD, as a switch feature in Qwest's ICONN database on the web, but Qwest was nonetheless denying access to this feature with UNE-P). At Workshop 4, Karen Stewart of Qwest responded to a comment by Michael Beach of WorldCom as follows (10/10/00 Transcript pp. 82-83):

> "MR. BEACH: You see my concern. I assume that to the extent that you have features available to retail customers using AIN and they become more available on AIN but less available on the switch then they become less available to competitors.
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> MS. STEWART: No, they would be available to you on the switch because you can still get any technically feasible functionality at the switch.
> So, let's just take an extreme. If Qwest was to decide to do no call forwarding with its local switch, none, and moved all call forwarding to an AIN platform, a CLEC purchaser could still choose to use all the call forwarding capability of that central office switch. It's not going to take anything away from you and your options to use the switch because you still get all of that feature functionality that that switch is capable of."

2002 Experience: Eschelon has had the same experience (feature unavailable with UNE-P), despite Qwest's testimony in 2000 that a switch feature would be available. Nortel Technical Publication (NTP) 297-8021-350, Standard 13.02, clearly shows that Remote Access Forwarding is a standard switch feature for the DMS switch. In March of 2002, Eschelon again pointed out to Qwest that Remote Access Forwarding is a switch feature so the capability should be available with UNE-P, and Qwest again confirmed that it is unavailable with UNE-P because Qwest categorizes it as an AIN feature. Qwest currently includes Remote Access Forwarding (AFD/AFM) on its list of "Features,

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Products, & Services Unavailable with UNE-P Products."[4] Despite Qwest's October 2000 paper commitment to provide the capabilities of the switch even when Qwest also moves such functionality on to an AIN platform for itself, Qwest continues to deny access to the Remote Access Forwarding switch feature capability with UNE-P.

B.   List of AIN Features

2000 – Sept. Comments, *see*, *e.g.*, pp. 21-22: "Eschelon has requested, but Qwest has not provided, a complete list of AIN features that are not available with UNE-P. . . . It is unclear which features fall into the AIN category. For example, Qwest initially included the same feature, Remote Call Forwarding (AFD), on the list of "Features Available for UNE-P-POTS" that it provided to Eschelon on June 22, 2000. . . . Later, Qwest removed the Remote Call Forwarding (AFD) feature . . . ."

2002 Experience: Qwest now provides a list of "UNE-P Features Not Available," but that list does not identify which features are unavailable because Qwest claims they are AIN features. Although the "UNE-P Features Not Available" List states that Voice Messaging and AIN services are not available with UNE-P, the list contains features that do not fall in to either of these categories (such as feature packages).[5] The only feature on Qwest's list that is specifically identified as "AIN" is "No Solicitation" (SB5).[6] For other features, the basis for unavailability is not provided. It is important to know the basis for Qwest's claim of unavailability so that a CLEC may confirm whether a feature is also a switch feature and pursue other means of obtaining the feature.

C.   Consistency in Feature and USOC Information & Documentation

2000 – Sept. Comments, *see*, *e.g.*, pp. 15-19 (describing extensive problems identifying features and USOCs available with UNE-P); *see also* Sept. Comments, p.17: "On May 31, 2000, knowing that Qwest provides an 'available for resale' feature list for resale services and features, Eschelon requested a similar document to help identify the features and services available for UNE-P."; *see also* Sept. Comments, p. 19: "Even now, the list Qwest has finally provided is admittedly incomplete and unclear as to whether all the included features are mechanized and, if not, on what date they will actually be available for order processing."

2002 Experience: Although Qwest now posts feature information on its web site in its product catalog (PCAT), inconsistencies and gaps remain. For example, Eschelon had to point out to Qwest that Qwest's "UNE-P Features Not Available" List showed that message waiting was not available with UNE-P when it should be available, and this

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[4] *See* http://www.qwest.com/wholesale/pcat/unep.html (click on "UNE-P Features Not Available" under "Optional Features" for UNE-P general information; no link to document by specific UNE-P product).
[5] Although some packages are listed, others (such as PGOCL) are not. The title of the document ("Features, Products & Services Unavailable with UNE-P Products") suggests that the list is more comprehensive than it is, which has led to confusion.
[6] *See* http://www.qwest.com/wholesale/pcat/unep.html (click on "UNE-P Features Not Available") (*compare* Remote Access Forwarding, which has no designation, *with* No Solicitation (SB5), which is designated as "AIN" on the list).

prompted Qwest to change the documentation. With respect to USOCs, Qwest instructs CLEC UNE-P providers to use IMA GUI to verify if a feature is available in each market. Without the correct USOC, however, the CLEC cannot do so. Eschelon asked Qwest on several occasions for a list of the available USOCs by market. Qwest provided a list to Eschelon on May 17, 2002. When Eschelon compares that list to Qwest's "UNE-P Features Not Available" List on Qwest's website, the two Qwest documents do not reflect the same information. For example, Qwest's May 17, 2002 USOC list states that ENT, FLT, and NL1 are available with UNE-P, but Qwest's "UNE-P Features Not Available" List shows that they are unavailable. Also, although Qwest has provided conflicting information with respect to Scan Alert, Qwest has most recently indicated that Scan Alert is available with UNE-P-POTS. Scan Alert is not listed, however, on Qwest's web site as a feature available with UNE-P-POTS. Conversely, Qwest has told Eschelon that Market Expansion Line (RCFVF, RCFVE) is unavailable with UNE-P, but Market Expansion Line is not included in Qwest's list of "Features, Products & Services Unavailable with UNE-P Products." If Qwest had agreed to Eschelon's May 2000 request to identify which of the features and USOCs on the "available for resale list" are and are not available with UNE-P, a more complete and reliable list would be available today for planning a UNE-P product. Instead, the effort to track down and verify information USOC by USOC is resource intensive and it adversely affects the ability to design and offer a full range of products.

3.   **TIME-CONSUMING AND CUMBERSOME UNE-P ORDERING**

Summary: Eschelon described the problems associated with forcing CLECs to individually address every USOC and its status on each UNE-P-POTS order in September of 2000, but Qwest has not yet resolved this issue.

2000 – Sept. Comments, *see, e.g.*, p. 25 (describing ordering as "time-consuming and cumbersome"); *see also* Sept. Comments, p. 26: "Eschelon must individually address every USOC and its status on each UNE-P-POTS order."; *see also* Sept. Comments, p. 27: ". . . Qwest's procedure substantially increases the time needed to input an order, and each added manual keystroke introduces the potential for error."

2002 Experience: Qwest continues to require CLECs to address every USOC and its status on each UNE-P order. Although Qwest described this process to Eschelon as "Conversion as Specified" ordering, Z-Tel and WorldCom have recently pointed out in CMP Change Request number SCR060702-1 that this type of ordering is commonly referred to in the industry as "Migrate as is with Changes." In the Change Request, Z-Tel asks Qwest to add the capability to convert customers as specified without having to list and map changes, adds or removes. Z-Tel points out that SBC, Verizon, and BellSouth all provide this pure migrate as specified capability for UNE-P customers. Eschelon described the problems associated with forcing CLECs to individually address every USOC and its status on each UNE-P-POTS order in September of 2000, but Qwest has not yet resolved this issue.

4.   INADEQUATE SUPPORT FOR RESOLVING ISSUES

Summary: Inadequate support and turnover in personnel (without adequate transition of information and duties) remain problems.

2000 – Sept. Comments, *see*, *e.g.*, p. 14: "Eschelon's provisioners often get results that should be obtained routinely only through creativity and persistence. Sometimes the only way to resolve an issue is to circumvent the process and go directly to a Qwest employee found to have knowledge, even though that person is not technically allowed to deal directly with Eschelon. Inadequate staffing and inaccessibility of personnel with the appropriate subject matter expertise are problems, and they adversely affect timeliness and adequacy of responses to inquiries."; *see also* Sept. Comments, p. 29: "Inconsistency in Qwest's performance and the knowledge level of its employees suggest inadequate training. In some cases, Eschelon personnel actually train Qwest's personnel in the course of resolving issues. Once a particular Qwest representative becomes knowledgeable, that knowledge is lost if the person leaves the company or moves to a different position, because Qwest's process and training are insufficient to provide continuity."

2002 Experience: Qwest recently changed the Senior Service Manager assigned to Eschelon again. The new individual is approximately the eighth Qwest account or service manager assigned to Eschelon. When a new person takes over, little is done to bring the individual up-to-speed on Eschelon's issues. Resources are expended on covering ground previously covered with the former representative. In the Fall of 2000, Eschelon was already voicing concerns about inadequate support. At that time, Qwest had an "account team" for Eschelon comprised of an account manager, senior account manager, service manager, and senior service manager. Since then, Qwest has eliminated the positions of account manager and senior account manager, so fewer resources are available for resolving service issues.[7] Qwest created "sales" roles instead of account roles. The "sales" representatives do not work on service issues and, if no "sales" are required, do not work on Eschelon's issues at all. Eschelon has questioned the value of a "sales" function in a monopoly supplier environment. Eschelon has asked Qwest to re-consider its reorganization and re-assign the "sales" resources to assist with service problems. Qwest denied Eschelon's request. Therefore, Qwest has designated resources to a "sales" capacity that Eschelon finds has little or no value, while Qwest has decreased the resources assigned to resolving service issues. The latter role was already understaffed and is more so now. When Eschelon filed comments in the fall of 2000, Eschelon also expressed concerns about the potential affect of Qwest layoffs on the amount of support available to CLECs. Now, additional potential layoffs at Qwest have

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[7] The service managers are so busy that they cannot reasonably handle all of a CLEC's issues. If any one person goes on vacation, the problem becomes more severe. Recently, for example, the Qwest senior service manager for Eschelon went on vacation while a pressing issue involving customer outages was pending. Qwest did not communicate to Eschelon how the issue would be handled in the person's absence. When Eschelon asked the Qwest service manager whether she would handle the issue in her supervisor's absence, she provided a one-word response: "No." Only when Eschelon pressed the issue did she agree to research the issue, and even then she did not commit to a timeframe (such as before her supervisor returns from vacation).

been again mentioned in the news. It is even more important, in this resource-constrained environment, that steps be taken to ensure adequate support for resolving performance issues. Eschelon continues to believe that the "sales" role is ineffective and those resources would be better used for resolving service issues.

5.   **CUTOVER ISSUES**

Summary: Qwest's performance with respect to timeliness of cutovers and new service installation quality for loops remains unsatisfactory. Although some of the other cutover problems raised previously (such as Qwest failure to conduct pre-work) have been reduced, the reduction in incidence of these problems has coincided with bi-weekly calls held between Eschelon and Qwest in which Eschelon proactively reviews the hot cuts and Qwest's processes with Qwest. Qwest has not documented a commitment to continue this process.

2000: Eschelon reported technical loop problems, missed scheduled times, untimely length of lift and lay, cuts that appeared successful on day of cut but trouble occurred shortly afterward, *etc*.

2002 Experience: As Eschelon's Report Cards provided to Qwest show (*see*, *e.g*., Exhibit 3 to Eschelon's FCC Comments), Qwest has received an unsatisfactory performance ranking for timeliness of coordinated cutovers and installation commitments met for UNE loops. Although some of the other cutover problems raised previously (such as Qwest failure to conduct pre-work) have been reduced, the reduction in incidence of these problems has coincided with bi-weekly calls held between Eschelon and Qwest in which Eschelon proactively reviews the hot cuts and Qwest's processes. Eschelon does not know whether, once Qwest receives 271 approval, Qwest will continue to devote resources to these calls for cutover analysis and review. Already, Qwest has failed to participate in the most recent scheduled calls, without even calling in advance to indicate that Qwest would not join the calls.